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Vice President  
Regulatory and Government Affairs

WISCONSIN PUBLIC SERVICE  
COMMISSION

2003 MAY 30 P 3:46

2180-71-139  


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May 30, 2003

RECEIVED

Lynda Dorr, Secretary to the Commission  
Public Service Commission of Wisconsin  
610 North Whitney Way  
P.O. Box 7854  
Madison, WI 53707-7854

RECEIVED

JUN - 2 2003

TELECOMMUNICATIONS  
DIVISION

Administration of the Mechanisms of Price Regulation Pertaining }  
To Verizon North Inc. on its June 1, 2003 Anniversary Date }

2180-TI-138

Dear Ms. Dorr,

The purpose of this letter is to request the Commission consideration of a waiver of a penalty relating to an out of service trouble clearing time measurement that is contained in its price regulation plan filing in the referenced docket. On this date, as a condition of its price regulation under Section 196.196 Stats., Verizon North Inc. has filed with the Public Service Commission of Wisconsin (PSCW) 10 copies of its annual progress report which contains information relevant to its operational performance during 2002. The information contained in the report is reviewed and evaluated by the PSCW to determine if Verizon is allowed to increase or required to decrease its rates for price regulated services under a price regulation formula detailed in Administrative Code Chapter PSC 163. One of the pieces of information reviewed by the Commission in the course of its investigation is the service quality performance of Verizon during 2002. Verizon is measured in 9 different service performance categories. A missed objective in any of these categories results in a penalty assessment that may ultimately result in a decrease in rates. If a utility misses a service objective due to exceptional circumstances, however, the Commission has the ability to waive or lessen that penalty assessment under (PSC163.04(2)(ct)). Verizon respectfully requests the PSCW to waive that penalty assessment for one of the 9 service quality measures.

The only service performance measurement Verizon missed in 2002 was one that required Verizon to clear 95% of all routine out of service (OOS) customer reported trouble within 24 hours. The measurement is reported on a monthly basis, and if this measurement is missed more than two months out of the 12, a penalty is assessed. Verizon missed this measurement during 3 months of 2002, achieving below standard percentages in March 2002 (93.01%), June 2002 (92%) and August 2002 (94.19%).

MFC  
COB  
ACT  
OGEZ  
TEL 5

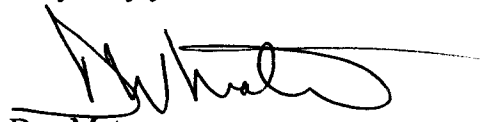
In past price regulation review filings, Verizon has consistently argued that certain non-routine conditions causing OOS trouble to occur are beyond the ability of the utility to control and can skew actual good performance results in certain instances. Certain weather disturbances, vandalism, and accidental damage to facilities by non-Verizon personnel are examples of such occurrences. The Commission addressed this issue in 2002 in Docket 05-TI-629 which investigated service quality standards for price regulated utilities for year 2004 price regulation filings. In a November 2002 order in that docket, the Commission approved a process for excluding certain "non routine" troubles from the OOS trouble count when certain extraordinary conditions were met in designated geographic areas. The order allowed this process to be used for trouble reporting purposes in the pertinent service quality measurements of price regulated utilities progress report filings for the 2003 calendar year. Verizon requests the Commission consideration of applying that same process approved in Docket 05-TI-629 to evaluate the legitimacy of Verizon's request for a waiver of the penalty relating to the OOS clearing time measurement described in the preceding paragraph for 2002.

Using the Commission approved process mentioned above to analyze the measurement relating to OOS clearing time has resulted in a significant number of trouble reports being excluded from the measurement, resulting in the objective being achieved for all the months in question. The attachment to this letter portrays the analysis that was done by Verizon to produce the revised results. Verizon plans to meet with the commission staff in regard to this matter to insure staff has complete understanding of the data analysis Verizon has conducted on this matter and if any further information is needed on this matter.

Verizon has been price regulated for 8 years. During that time, as evidenced by its annual progress report filings including the filing for 2002, it has provided superior service quality to its Wisconsin customers. Verizon applauds the Commission decision in Docket 05-TI-629 that provides an equitable and fair process for evaluating whether certain service quality measurements can be changed to minimize the risk of unfair penalties being assessed in certain circumstances relating to service quality performance. Verizon is unable to find any reason that prevents the Commission from utilizing this process for 2002 results to insure fair treatment in the above referenced filing. Verizon observes that what is considered fair treatment for price regulated utilities for 2003 should also be considered fair treatment to those utilities for 2002.

Verizon appreciates the Commission consideration of this matter and respectfully requests a favorable determination relating to its waiver request.

Very truly yours,



Dan Matson

Cc: Gary Evenson with attachments  
Chris Larson with attachments  
Murugan Kollengode with attachments

## SCHEDULE C

### VERIZON NORTH, INC. - WISCONSIN 2002 PERFORMANCE

#### Percent Out of Service Troubles Cleared in 24 Hours - By Month

<u>Month</u>	<u>Routine and Non-Routine OOS Troubles</u>	<u>Total OSS Cleared Within 24 hrs</u>	<u>% OSS Cleared Within 24 hrs</u>	<u>% OSS Cleared Within 24 hrs Excluding Non- Routine Troubles</u>
Jan	1051	1043	99.24	99.24
Feb	1076	1055	98.05	98.05
Mar	1516	1410	93.01	<b>97.17</b>
Apr	2135	2089	97.85	97.85
May	1930	1891	97.98	97.98
Jun	3511	3230	92.00	<b>97.35</b>
Jul	2958	2847	96.25	96.25
Aug	3633	3422	94.19	<b>96.20</b>
Sep	2597	2480	95.49	95.49
Oct	2190	2096	95.71	95.71
Nov	1387	1352	97.48	97.48
Dec	1222	1201	98.28	98.28

# SCHEDULE C

## VERIZON NORTH INC. - WISCONSIN NON-ROUTINE TROUBLE REPORTS Trouble Reports > 2X Daily Average for Calendar Quarter

March 2002

<u>Regulatory Group</u>	<u>CO Code</u>	<u>Age Date</u>	<u>Date</u>	<u>OOS Cleared in 24?</u>	<u>Quantity</u>
Section 01	OH14720	20020301	20020308	N	1
Section 01	OH14510	20020301	20020309	N	1
Section 01	OH14720	20020301	20020309	N	1
Section 02	OH14025	20020301	20020308	N	1
Section 02	OH14235	20020301	20020308	N	2
Section 02	OH14484	20020301	20020308	N	3
Section 02	OH14025	20020301	20020309	N	1
Section 02	OH14035	20020301	20020309	N	4
Section 02	OH14170	20020301	20020309	N	1
Section 02	OH14235	20020301	20020309	N	4
Section 02	OH14445	20020301	20020309	N	3
Section 02	OH14484	20020301	20020309	N	2
Section 02	OH14293	20020301	20020310	N	3
Section 02	OH14445	20020301	20020310	N	2
Section 02	OH14750	20020301	20020310	N	2
Section 02	OH14035	20020301	20020311	N	1
Section 02	OH14420	20020301	20020312	N	1
Section 04	OH16517	20020301	20020308	N	1
Section 05	OH16215	20020301	20020309	N	1
Section 05	OH16415	20020301	20020309	N	5
Section 05	OH16675	20020301	20020309	N	1
Section 06	OH16838	20020301	20020304	N	1
Section 06	OH16115	20020301	20020309	N	1
Section 06	OH16576	20020301	20020309	N	2
Section 06	OH16820	20020301	20020309	N	1
Section 06	OH16838	20020301	20020309	N	2
Section 07	OH16473	20020301	20020308	N	1
Section 09	OH12515	20020301	20020311	N	1
Section 10	OH14848	20020301	20020308	N	1
Section 10	OH14850	20020301	20020308	N	2
Section 10	OH14848	20020301	20020309	N	4
Section 10	OH14849	20020301	20020309	N	3
Section 10	OH14850	20020301	20020309	N	4
Section 10	OH14450	20020301	20020311	N	1

Total Excludes = 65

March Numerator = 1410

March Denominator = 1516

March Adjusted Denominator = 1451

March Original Result \*\* = 93.01%

March Adjusted Result = 97.17%

**SCHEDULE C**

**VERIZON NORTH INC. - WISCONSIN  
NON-ROUTINE TROUBLE REPORTS  
Trouble Reports > 2X Daily Average for Calendar Quarter**

<u>June 2002</u>					
<u>Regulatory Group</u>	<u>CO Code</u>	<u>Age Date</u>	<u>Date</u>	<u>OOS Cleared In 24?</u>	<u>Quantity</u>
Section 01	OH14810	20020601	20020611	N	1
Section 01	OH14815	20020601	20020622	N	6
Section 01	OH14810	20020601	20020627	N	1
Section 02	OH14170	20020601	20020603	N	3
Section 02	OH14025	20020601	20020611	N	1
Section 02	OH14035	20020601	20020611	N	1
Section 02	OH14170	20020601	20020611	N	1
Section 02	OH14235	20020601	20020611	N	2
Section 02	OH14293	20020601	20020611	N	1
Section 02	OH14445	20020601	20020611	N	4
Section 02	OH14484	20020601	20020611	N	9
Section 02	OH14025	20020601	20020622	N	4
Section 02	OH14035	20020601	20020622	N	5
Section 02	OH14170	20020601	20020622	N	11
Section 02	OH14235	20020601	20020622	N	5
Section 02	OH14293	20020601	20020622	N	12
Section 02	OH14420	20020601	20020622	N	7
Section 02	OH14445	20020601	20020622	N	4
Section 02	OH14465	20020601	20020622	N	1
Section 02	OH14484	20020601	20020622	N	9
Section 02	OH14580	20020601	20020622	N	6
Section 02	OH14750	20020601	20020622	N	6
Section 02	OH14770	20020601	20020622	N	5
Section 02	OH14025	20020601	20020624	N	1
Section 02	OH14081	20020601	20020624	N	2
Section 02	OH14170	20020601	20020624	N	5
Section 02	OH14293	20020601	20020624	N	1
Section 02	OH14420	20020601	20020624	N	8
Section 02	OH14445	20020601	20020624	N	1
Section 02	OH14465	20020601	20020624	N	1
Section 02	OH14580	20020601	20020624	N	1
Section 02	OH14750	20020601	20020624	N	1
Section 02	OH14770	20020601	20020624	N	3
Section 02	OH14025	20020601	20020626	N	1
Section 02	OH14035	20020601	20020626	N	2
Section 02	OH14580	20020601	20020626	N	1
Section 03	OH12241	20020601	20020624	N	1
Section 03	OH12743	20020601	20020624	N	1
Section 03	OH12041	20020601	20020626	N	1
Section 04	OH16517	20020601	20020604	N	1
Section 05	OH16406	20020601	20020604	N	1
Section 05	OH16215	20020601	20020611	N	1
Section 05	OH16415	20020601	20020611	N	1
Section 05	OH16505	20020601	20020626	N	1

**SCHEDULE C****VERIZON NORTH INC. - WISCONSIN  
NON-ROUTINE TROUBLE REPORTS****Trouble Reports > 2X Daily Average for Calendar Quarter**

Section 06	OH16576	20020601	20020604	N	1
Section 06	OH16838	20020601	20020604	N	2
Section 06	OH16120	20020601	20020619	N	1
Section 07	OH16840	20020601	20020603	N	2
Section 07	OH16240	20020601	20020604	N	1
Section 07	OH16360	20020601	20020604	N	1
Section 07	OH16458	20020601	20020604	N	1
Section 07	OH16205	20020601	20020606	N	1
Section 09	OH12515	20020601	20020603	N	2
Section 10	OH14450	20020601	20020603	N	1
Section 10	OH14848	20020601	20020603	N	2
Section 10	OH14848	20020601	20020610	N	1
Section 10	OH14848	20020601	20020611	N	2
Section 10	OH14849	20020601	20020611	N	5
Section 10	OH14850	20020601	20020611	N	1
Section 10	OH14450	20020601	20020622	N	9
Section 10	OH14848	20020601	20020622	N	4
Section 10	OH14850	20020601	20020622	N	2
Section 10	OH14450	20020601	20020624	N	7
Section 10	OH14450	20020601	20020626	N	4
Section 11	OH16775	20020601	20020603	N	1

**Total Excludes = 193****June Numerator = 3230****June Denominator = 3511****June Adjusted Denominator = 3318****June Original Result \*\* = 92.00%****June Adjusted Result = 97.35%**

# SCHEDULE C

## VERIZON NORTH INC. - WISCONSIN NON-ROUTINE TROUBLE REPORTS Trouble Reports > 2X Daily Average for Calendar Quarter

August 2002

<u>Regulatory Group</u>	<u>CO Code</u>	<u>Age Date</u>	<u>Date</u>	<u>OOS Cleared in 24?</u>	<u>Quantity</u>
Section 01	OH14720	20020801	20020801	N	1
Section 01	OH14810	20020801	20020801	N	1
Section 02	OH14035	20020801	20020812	N	2
Section 02	OH14081	20020801	20020812	N	1
Section 02	OH14235	20020801	20020812	N	2
Section 02	OH14293	20020801	20020812	N	2
Section 02	OH14445	20020801	20020812	N	4
Section 02	OH14465	20020801	20020812	N	2
Section 02	OH14484	20020801	20020812	N	5
Section 02	OH14035	20020801	20020817	N	7
Section 02	OH14235	20020801	20020817	N	12
Section 02	OH14445	20020801	20020817	N	2
Section 02	OH14170	20020801	20020820	N	1
Section 02	OH14293	20020801	20020820	N	1
Section 03	OH12041	20020801	20020731	N	1
Section 03	OH12743	20020801	20020731	N	1
Section 03	OH12839	20020801	20020731	N	1
Section 03	OH12743	20020801	20020805	N	2
Section 03	OH12743	20020801	20020817	N	2
Section 03	OH12743	20020801	20020826	N	1
Section 05	OH16406	20020801	20020822	N	1
Section 06	OH16120	20020801	20020822	N	6
Section 06	OH16576	20020801	20020822	N	6
Section 06	OH16202	20020801	20020823	N	4
Section 06	OH16576	20020801	20020823	N	1
Section 08	OH12745	20020801	20020822	N	1
Section 08	OH12745	20020801	20020823	N	1
Section 09	OH12155	20020801	20020821	N	1
Section 09	OH12830	20020801	20020821	N	1
Section 09	OH12550	20020801	20020822	N	1
Section 10	OH14450	20020801	20020813	N	1
Section 11	OH16775	20020801	20020822	N	1

Total Excludes = 76

August Numerator = 3422

August Denominator = 3633

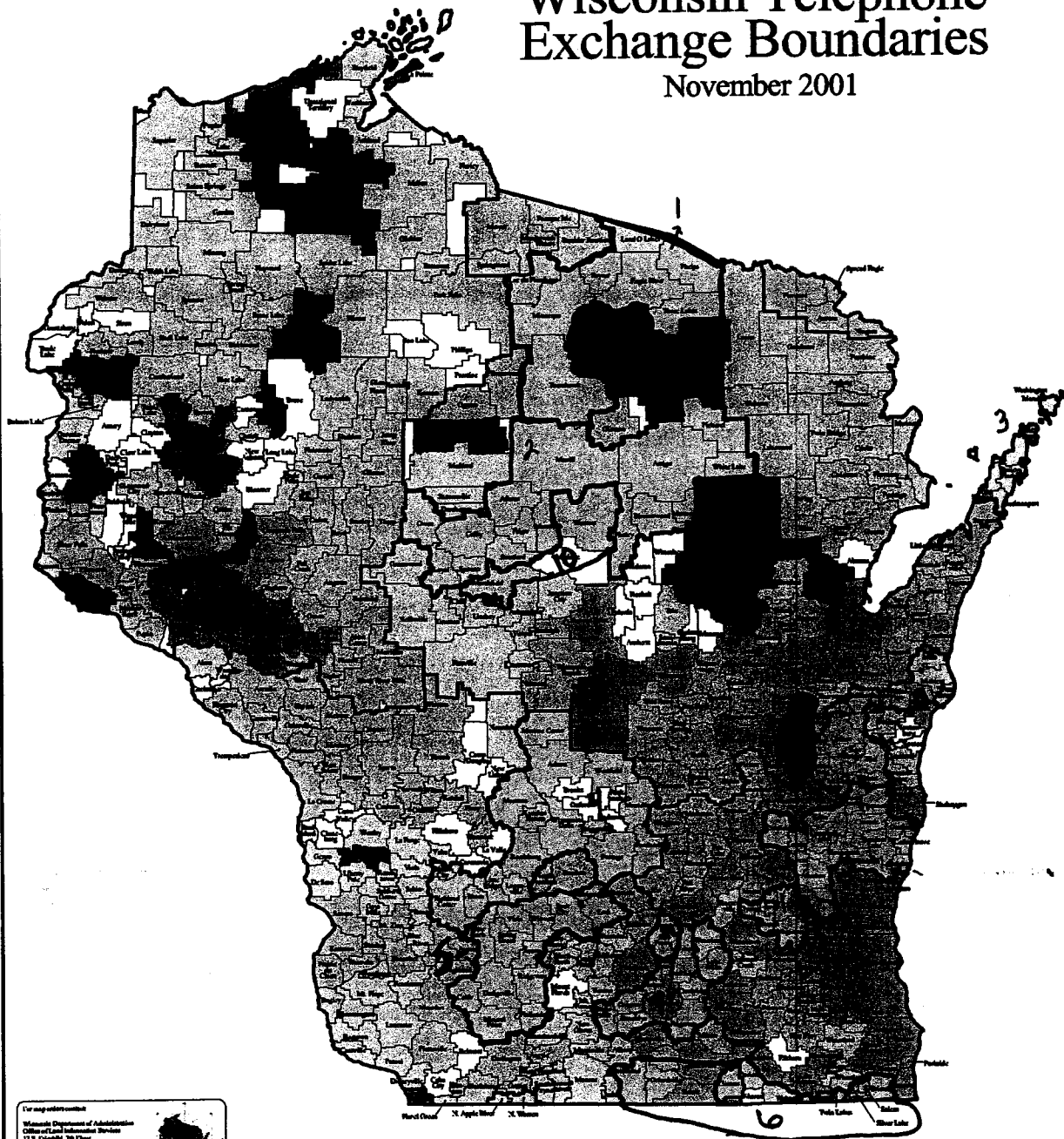
August Adjusted Denominator = 3557

August Original Result \*\* = 94.19%

August Adjusted Result = 96.20%

# Wisconsin Telephone Exchange Boundaries

November 2001



For map ordering contact:  
Wisconsin Department of Administration  
Office of Land Information Services  
17 S. Delafield, 7th Floor  
Madison, WI 53703-2279  
608-261-3000  
CDLmapland@dnr.wisconsin.gov  
http://www.dnr.wisconsin.gov/landinfo.asp

## Holding Company, Independent Company, or Cooperative

	Alliance Communications (5)		Marquette-Adams Co-op. (4)		Unassigned Territory (74)		LATA Boundaries
	Ameritech (78)		Nelson Telephone Co-op. (4)		Under 10,000 lines or <3 exch (47)		* Indicates a switcher area
	CenturyTel, Inc. (197)		Niagara Telephone Company (4)		Union Telephone Company (4)		
	Chequamegon Telephone Co-op. (13)		Northeast Communications, Inc. (4)		Verizon North, Inc. (117)		
	Chibardun Telephone Co-op. (6)		Open Territory (50)		Vernon Telephone Co-op. (8)		
	Citizens Communications Co. of WI (24)		Richland-Grant Telephone Co-op. (5)		West Wisconsin Telecom Co-op. (5)		
	Lakeland Communications, Inc. (4)		Telephone and Data Systems Inc. (58)		Wood County Telephone Co. (4)		
			Tri-County Telephone Co-op. (6)				